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Attorneys for Defendant
SHARP ELECTRONICS CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Stephanie Truong, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

LG Phillips LCD Co., Ltd, et al.,

Defendants.

No. C-06-7640 SI

STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT

STIPULATION FOR EXTENSION OF TIME

WHEREAS plaintiff filed a complaint in the above-captioned case on or about
December 12, 2006;

WHEREAS plaintiff alleges antitrust violations by manufacturers of Liquid Crystal
Display ("LCD") products;

WHEREAS more than fifteen complaints have been filed to date in federal district
courts throughout the United States by plaintiffs purporting to bring class actions on behalf
of indirect purchasers alleging antitrust violations by manufacturers of LCD products
(collectively, "the LCD Cases");

WHEREAS there are motions pending before the Judicial Panel on Multidistrict Litigation to transfer the LCD Cases to the Northern District of California or the District of New Jersey for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407;

WHEREAS plaintiff anticipates the possibility of Consolidated Amended Complaints in the LCD Cases;

WHEREAS plaintiff and defendant Sharp Electronics Corporation ("SEC") have agreed that an orderly schedule for any response to the pleadings in the LCD Cases would be more efficient for the parties and for the Court;

WHEREAS plaintiff agrees that the deadline for SEC to respond to the Complaint shall be extended until the earlier of the following two dates: (1) forty-five days after the filing of a Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after plaintiff provides written notice to SEC that she does not intend to file a Consolidated Amended Complaint, provided that such notice may be given only after the initial case management conference in the MDL transferee court in this case;

WHEREAS plaintiff further agrees that this extension is available, without further stipulation with counsel for plaintiff, to all named defendants who notify plaintiff in writing of their intention to join this extension;

WHEREAS this Stipulation does not constitute a waiver by SEC or any defendant of any defense, including but not limited to the defenses of lack of personal or subject matter jurisdiction, insufficiency of process, insufficiency of service of process, or improper venue.

PLAINTIFF AND DEFENDANT SHARP ELECTRONICS CORPORATION, BY AND THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE AS FOLLOWS:

1. The deadline for the SEC to respond to the Complaint shall be extended until the earlier of the following two dates: (1) forty-five days after the filing of a Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after the plaintiff provides

1 written notice that she does not intend to file a Consolidated Amended Complaint, provided
2 that such notice may be given only after the initial case management conference in the
3 MDL transferee court in this case.

4 2. This extension is available, without further stipulation with counsel for
5 plaintiff or further order of the Court, to all named defendants who notify plaintiff in
6 writing of their intention to join this extension.

7 IT IS SO STIPULATED.

8
9 Dated: January 8, 2007

Dated: January 8, 2007

10 Signature: /s/ Christopher L. Lebsock

Signature: /s/ Albert J. Boro, Jr.

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20 Counsel for Plaintiff Stephanie Truong

21 SO ORDERED:

22 Dated:


United States District Judge